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GROUND FISH MANAGEMENT TEAM STATEMENT ON STRATEGIC PLANNING INITIATIVES

At its October meeting, the Groundfish Management Team (GMT) reviewed the capacity-reduction initiatives awaiting further Council attention that are identified in Exhibit G.9, Supplemental Attachment 2. The GMT supports continued Council ranking of capacity reduction within the trawl fleet as its highest priority among these initiatives. Rather than focusing on ranking each of the identified initiatives, the GMT believes it is better situated to identify issues affecting the long-term value of investments of limited staff and funding resources in the development of specific proposals during 2003.

The GMT concurs with the GAP that, if possible, implementation of trawl permit buyback should occur prior to implementing other options such as stacking or ITQs. This sequence would afford the greatest opportunities for successful and expedient implementation of these latter, longer-term approaches to capacity management. Initial reduction of the fleet through buyback is likely to produce a resulting fleet having less variation in historic participation, which is in turn apt to allow swifter consensus-building in the resolution of allocation-related aspects of ITQ or stacking programs.

Our understanding is that NMFS is attempting to expedite implementation of an industry-funded buyback for the west coast, limited-entry trawl fleet. If this effort is successful, it may be possible to begin removing capacity from this fishery during 2003. If the process cannot be expedited, it may be two years or so before buying back of permits can begin. This uncertainty poses challenges for determining what other initiatives may yield the greatest results from Council-directed work during 2003. For example, the development and analysis of trawl permit stacking or ITQ alternatives will be influenced by the composition of the fleet to which these measures would be applied. Alternatives developed for application to a very diverse 270-vessel trawl fleet would likely be considerably different than those for a more homogeneous 150-vessel fleet. And even if plan development proceeds on the assumption that buyback will occur by the time the Council is ready to take action, it will be difficult for supporting analysis to fully anticipate the composition of the post-buyback fleet prior to the buyback actually occurring. Further, even though the moratorium on ITQs has lapsed, it appears unlikely that NMFS would consider approving any new programs until a comprehensive set of guidelines for implementation has been developed. And while design of a west coast program would likely take longer than guideline development, considerable time could be wasted before guidelines are published, through discussion or tentative adoption of options that are subsequently prohibited by the guidelines.

Conversion of the directed open-access fishery to limited entry has been an expressed priority of the GMT for several years. However, ongoing state initiatives in Oregon and California (and the existing Washington ban on commercial fishing inside three miles) are likely to substantially address commercial capacity/effort concerns in the nearshore fisheries before a Council program could be implemented. State efforts will not directly restrict open-access effort in fisheries outside of the nearshore area, however the recent progression of fishing opportunity constraints leaves sablefish and southern slope rockfish as the only major groundfish targets where access will not be constrained by state programs. As discussed in conjunction with VMS development, conversion to limited entry would still confer benefits in the form of identifying directed fishery participants. Regardless of whether the Council elects to elevate this initiative "above the line" for 2003, the GMT believes that it is important for the Council to continue to facilitate a forum for discussing and resolving issues associated with state efforts to restrict open-access participation.

Regarding potential changes to the cap on the number of stacked permits in the primary fixed-gear sablefish fishery, the GMT notes that this program has demonstrated that it can significantly reduce the number of vessels participating in the fishery. Roughly one-third of qualifying permits have already been stacked on other vessels. However, even though further reduction in the number of participants would be expected with a doubling of the current cap, it is not clear that the amount of additional reduction would be comparable to that already observed with the ability to stack three permits. Additionally, the GMT notes that what appears to a minor wording change in the cap (from 3 to 6), would still require a full NEPA analysis, and the considerable staff time associated with development of any plan amendment package.